

Exhibit C

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Ravidath Lawrence RAGBIR, et. al,

Plaintiff,

v.

Thomas HOMAN, in his official capacity as
Acting Director of Immigration and Customs
Enforcement, *et. al*,

Defendant.

Civil Action No. 18-cv-01159-PKC

Hon. P. Kevin Castel

**NOTICE OF DEPOSITION OF
IMMIGRATION AND
CUSTOMS ENFORCEMENT
PURSUANT TO RULE 30(b)(6)**

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure Plaintiffs represented by Arnold & Porter Kaye Scholer LLP and Washington Square Legal Services, Inc. (collectively, the “Plaintiffs”) hereby notice the deposition upon oral examination of Immigration and Customs Enforcement (“ICE”), through the officers, directors, agents, or other persons with the most knowledge concerning the topics listed in Schedule A annexed to Plaintiffs’ Notice of Deposition of ICE, which is incorporated by reference as if set forth fully herein. The deposition will commence at 9:00 a.m. on a date prior to _____, 2019 at the offices of Arnold & Porter Kaye Scholer LLP, at 250 W. 55th Street, New York, New York, 10019, or at such date, time, and place as is otherwise agreed to by the parties or ordered by the Court.

PLEASE TAKE FURTHER NOTICE that the deposition will be taken before a notary public or other officer duly authorized to administer oaths, will be recorded by stenographic and videographic means, and will continue from day to day until completed. You are invited to attend and participate in the manner provided for in the Federal Rules of Civil Procedure. ICE is requested to provide counsel for Plaintiffs with written notice, on or before _____, 2019, of

the name(s) and position(s) of the designee(s) who will testify on behalf of ICE and to identify the matters on which each designee will testify.

Dated: New York, New York
_____, 2019

ARNOLD & PORTER KAYE SCHOLER LLP

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Attorneys for Plaintiffs

SCHEDULE A

TOPICS FOR EXAMINATION

1. ICE's enforcement actions against Ravidath Ragbir, including:
 - a. Denial of Mr. Ragbir's application for renewal of an administrative stay of removal;
 - b. Revocation of Mr. Ragbir's administrative stay of removal;
 - c. Revocation of Mr. Ragbir's order of supervision;
 - d. Arrest and detention of Mr. Ragbir in January 2018;
 - e. Placement of Mr. Ragbir in Krome Detention Center in Florida;
 - f. Efforts to obtain a travel document for Mr. Ragbir;
2. ICE's decision to enforce Ravidath Ragbir's order of removal.
3. ICE surveillance of the New Sanctuary Coalition and its members including, but not limited to, Mr. Ragbir and Mr. Montrevil.
4. ICE surveillance of Mr. Ragbir's home, located at 193 State Street, Brooklyn, New York 11201.
5. ICE surveillance of the New Sanctuary Coalition or Judson Church, located at 55 Washington Square South, New York, NY 10012.
6. Ravidath Ragbir's current order of supervision;
7. Any decision or decision making process established relating to Ravidath Ragbir's immigration status or removal from the United States since January 2018.